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March 25, 2019

VIA ELECTRONIC FILING

The Honorable Jocelyn D. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

Re: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company; Docket No. 2019-2-E

Dear Ms. Boyd:

Enclosed for filing on behalf of South Carolina Electric & Gas Company ("SCE&G" or the "Company") in the above-referenced matter is the rebuttal testimony of John H. Raftery, Matthew W. Tanner, Joseph M. Lynch, Eric H. Bell, and James W. Neely. In addition, enclosed for filing in the above-referenced matter is the rebuttal testimony and exhibit of J. Darrin Kahl.

SCE&G is filing both confidential and public versions of the rebuttal testimony of J. Darrin Kahl. The confidential information is on pages 2-4, 7-8, and 14-16 and has been redacted from the public version of Mr. Kahl's testimony (marked as the "Public Version"). The confidential version of Mr. Kahl's testimony has been marked as the "Confidential Version."

SCE&G asserts that the Confidential Version of Mr. Kahl's rebuttal testimony uses, discusses, references, or otherwise incorporates information that is proprietary, commercially and/or competitively sensitive, confidential, and in the nature of a trade secret ("Confidential Information"). More specifically, portions of the confidential rebuttal testimony of Mr. Kahl address issues including, but not limited to, natural gas supplies and costs and SCE&G's contracts

for natural gas transportation, delivery, and supply services. Based upon SCE&G's experience, the disclosure of this information could create a competitive disadvantage for the Company in negotiating future natural gas supply, transportation, and delivery contracts. Consequently, the public release of this information could adversely affect the Company's ability to enter into arms-length transactions with its natural gas vendors, resulting in the potential for less favorable terms and prices for SCE&G and its customers. In addition, disclosure of information regarding the amounts of natural gas delivered to SCE&G at various supply points poses a potential security risk to the Company's natural gas system. Therefore, SCE&G submits that this testimony constitutes confidential information that is proprietary, commercially and/or competitively sensitive or confidential, or in the nature of a trade secret. The Company further asserts that affording confidential treatment of this testimony is in the public interest and in accord with the South Carolina Freedom of Information Act, S.C. Code Ann. §§ 30-4-10 *et seq.*, regulations of the Public Service Commission of South Carolina ("Commission"), and other applicable law.

Accordingly, SCE&G hereby requests that the Commission find that the Confidential Version of Mr. Kahl's testimony contains protected confidential information and that the Commission issue a protective order barring the disclosure of the confidential information under the South Carolina Freedom of Information Act, S.C. Code Ann. §§ 30-4-10 *et seq.*, S.C. Code Ann. Regs. 103-804(S)(2) Commission of South Carolina ("Commission"), and other applicable law.

To this end, and in accordance with Commission Order No. 2005-226, dated May 6, 2005, in Docket No. 2005-83-A, I am enclosing with this letter a redacted version of Mr. Kahl's rebuttal testimony that protects from disclosure the competitively sensitive information, while making available for public viewing non-protected information. Contemporaneous with the electronic filing, we also are filing via hand delivery the original of the unredacted Confidential Version of Mr. Kahl's rebuttal testimony in a separate, sealed envelope. The Company respectfully requests that, in the event anyone should seek disclosure of this unredacted testimony, the Commission notify SCE&G of such request and provide it with an opportunity to obtain an order from this Commission or a court of competent jurisdiction protecting the testimony from disclosure.

By copy of this letter, we are serving all parties of record with a public copy of the enclosed testimony and exhibits. Additionally, we are providing to the parties of record who have executed a confidentiality agreement with SCE&G and to ORS pursuant to S.C. Code Ann. § 58-4-55 a copy of the Confidential Version of the testimony of J. Darrin Kahl.

If you have any questions regarding these matters, please do not hesitate to contact me.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.

s/Benjamin P. Mustian

Benjamin P. Mustian

BPM/
enclosures

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